

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ANGELA HEYDLAUFF, an individual,

Plaintiff,

v.

THE BOEING COMPANY, A DELAWARE  
CORPORATION.

Defendant.

NO. 2:17-cv-00687

ORDER GRANTING STIPULATED  
MOTION TO EXTEND DEADLINE FOR  
THE LIMITED PURPOSE OF 30(b)(6)  
DEPOSITION(S)

NOTE FOR MOTION:  
January 17, 2019

Pursuant to Fed. R. Civ. P. 29, Plaintiff Angela Heydlauff (“Heydlauff”) and Defendant The Boeing Company (“Boeing”) (together, the “Parties”), by and through their undersigned counsel, and subject to the Court’s approval, hereby stipulate to an additional, limited extension of the current deadline to conduct discovery for the limited purpose of allowing Plaintiff to take 30(b)(6) deposition(s) of Boeing’s corporate representative(s). In support of the stipulated motion, the Parties state as follows:

1. On October 19, 2018, Plaintiff served Plaintiff’s Third Interrogatories and Requests for Production which, in pertinent part, relate to potential open jobs at Boeing for which Plaintiff alleges she met the minimum qualifications and needed to be reassigned under the Americans with Disabilities Act. On October 25, Plaintiff served a deposition notice to take a 30(b)(6) deposition of Boeing related to the jobs identified in Plaintiff’s discovery requests.

1           2.       The parties agreed in November 2018 that, based on written information and  
2 documents provided by Boeing on November 19, 2018 in response to Plaintiff's discovery  
3 requests, Plaintiff will identify 3-5 jobs about which Boeing will produce a corporate  
4 representative to testify pursuant to Plaintiff's notice of 30(b)(6) deposition. The parties agreed  
5 that this may necessitate 3-5 separate individuals who can testify on its behalf about these jobs.  
6 *See* FRCP 30(b)(6)("[t]he named organization must then designate one or more...persons who  
7 consent to testify on its behalf").

8           3.       Discovery in the case closed on November 30, 2018, except that the Court granted  
9 the parties' prior motion to extend the deadline for all depositions until December 7, 2018. Dkt.  
10 20, 25. Because scheduling over the holidays was difficult and the parties already had a number  
11 of other depositions scheduled in December, the parties stipulated and jointly moved for an  
12 extension of the December 7 discovery cutoff to January 25, 2019, for the limited purpose of  
13 completing two remaining depositions only: (1) the narrowed 30(b)(6) deposition of Boeing; and  
14 (2) the deposition of Wesley Heydlauff. Dkt. 26.

15           4.       The Court granted the motion. Dkt. 42. Under the Court's operative Order  
16 Granting Stipulated Motion to Extend Discovery Deadlines, the current deadline to complete  
17 those two remaining depositions is January 25, 2019. *Id.*

18           5.       On January 14, 2019, Plaintiff served Defendant with a third amended 30(b)(6)  
19 notice of deposition, identifying five positions about which Plaintiff sought testimony. Plaintiff  
20 scheduled the deposition(s) for January 23, 2019.

21           6.       Due to scheduling, coordination, and preparation concerns, the parties are unable  
22 to complete the deposition(s) on January 23 or any other date before the January 25 deadline..

23           7.       The parties therefore have agreed, and move this Court, to extend the discovery  
24 cutoff in this case to February 15, 2019, for the limited purpose of allowing Plaintiff to conduct a  
25 30(b)(6) deposition of Boeing's corporate representative.

26           8.       At this point, the Parties do not anticipate any issues in completed Wesley

1 Heydlauff's deposition before January 25, 2019. The Parties have been in contact with Mr.  
2 Heydlauff, and have noticed his deposition to take place on January 24, 2019, which date he  
3 proposed as an available option.

4 9. The Parties also respectfully submit that this limited extension should not affect  
5 any other deadlines in the case.

6 10. The parties had previously agreed to an extension of the overall case deadlines to  
7 accommodate the maternity leave of Plaintiff's counsel, and had agreed to a limited extension of  
8 the discovery motions cutoff and discovery deadline to accommodate their good faith efforts to  
9 complete discovery and cooperatively resolve their disputes without need for motions practice.  
10 The parties have thus far been able to cooperatively work out all scheduling and other disputes in  
11 this case without resort to motions practice. The Parties submit that this stipulation is filed in  
12 good faith and not to cause delay or for any other improper purpose.

13 THEREFORE, subject to the Court's approval pursuant to Fed.R.Civ. P. 29(b), the  
14 Parties stipulate and agree, and respectfully request that the Court order, as follows:

15 The deadline to complete depositions shall be extended from January 25, 2019, to  
16 February 15, 2019, for the limited purpose of allowing depositions pursuant to Plaintiff's third  
17 amended notice of deposition of 30(b)(6) corporate representative.

18 DATED: January 17, 2019  
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*Attorneys for Defendant The Boeing Company*

**ORDER**

It is so ORDERED.

DATED this 17th day of January, 2019.



Marsha J. Pechman  
United States District Judge